

P O R T E R | S C O T T

A PROFESSIONAL CORPORATION

William E. Camy, SBN 291397

Matthew W. Gross, SBN 324007

350 University Avenue, Suite 200

Sacramento, California 95825

TEL: 916.929.1481

FAX: 916.927.3706

OFFICE OF COUNTY COUNSEL

COUNTY OF BUTTE

Brad J. Stephens, SBN 212246

25 County Center Drive

Oroville, CA 95965

TEL: (530) 538-7621

FAX: (530) 538-6891

Attorneys for Defendant, COUNTY OF BUTTE

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

JASON HARTMAN and ASHLEY
HARTMAN,

Plaintiffs,

v.

UNITED STATES OF AMERICA;
MICHAEL SAMPSON; COUNTY OF
BUTTE; CITY OF BIGGS; EAN
HOLDINGS, INC.; and ENTERPRISE
RENT-A-CAR,

Defendants.

No. 2:20-cv-1492 KJM DB

**STIPULATION AND ORDER TO EXTEND
DISCOVERY AND EXPERT DISCLOSURE
DEADLINES**

1 IT IS HEREBY STIPULATED by and between the parties, *through their respective counsel of*
2 *record:*

- 3 1. The current deadline to complete non-expert discovery is September 23, 2022. Due to the
4 number of the parties and the number of issues in the case, the parties will be unable to
5 complete discovery by the current deadline despite their diligent efforts. Therefore, the parties
6 agree the deadline to complete non-expert discovery should be continued by two months, to
7 November 23, 2022.
- 8 2. The current deadline to disclose expert witnesses is October 21, 2022. The parties agree that
9 the deadline to disclose expert witnesses should occur after the close of non-expert discovery.
10 Given that the parties agree the non-expert discovery deadline should be continued to
11 November 23, 2022, the parties also agree that the deadline to disclose expert witnesses should
12 be continued to December 7, 2022, and the deadline to disclose supplemental/rebuttal experts
13 shall be January 6, 2023.
- 14 3. The parties further agree that all other deadlines, including the deadline to complete expert
15 discovery (February 24, 2023) and the deadline to file a dispositive motion (February 17, 2023)
16 shall remain unchanged.
- 17 4. The parties agree there is good cause for the proposed modifications to the scheduling order
18 referenced in paragraphs 1-3, above.
- 19 5. The proposed modifications to the scheduling order referenced in paragraphs 1-3, above, will
20 not impact the Court's schedule, including the dispositive motion hearing deadline, currently
21 set for March 24, 2023.

22 **IT IS SO STIPULATED.**

23
24 Date: July 21, 2022

DEMAS LAW GROUP

25
26 By /s/ Tim S. Spangler

27 Tim S. Spangler
Attorneys for Plaintiff
JASON HARTMAN

1 Date: July 25, 2022

PORTER | SCOTT
A PROFESSIONAL CORPORATION

2
3 By /s/ William E. Camy
4 William E. Camy
5 Matthew W. Gross
6 Attorneys for Defendant
7 COUNTY OF BUTTE

8 Date: July 21, 2022

UNITED STATES ATTORNEY

9
10 By /s/ Brendon L. S. Hansen
11 Rachel R. Davidson
12 Brendon L.S. Hansen
13 Attorneys for Defendant
14 UNITED STATES OF AMERICA

15 Date: July 21, 2022

SELMAN BREITMAN LLP

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17 By /s/ Jennifer J. Capabianco
18 Jennifer J. Capabianco
19 Attorneys for Defendant
20 UNITED STATES OF AMERICA
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ORDER

Having reviewed the above stipulation, and good cause appearing, it is hereby ordered as follows:

1. The deadline to complete non-expert discovery is continued to November 23, 2022.
2. The deadline to disclose expert witnesses is continued to December 7, 2022.
3. The deadline to disclose supplemental/rebuttal expert witnesses is continued to January 6, 2023.
4. All other deadlines previously set forth in the Court's scheduling order remain unchanged.

IT IS SO ORDERED.

DATED: July 25, 2022

/s/ DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE